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By ECF and Facsimile

The Honorable Alvin K. Hellerstein
United States District Judge for the
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Frank Dinucci, Jr.*, No. 18 Cr. 00332 (AKH)

Dear Judge Hellerstein:

We write on behalf of our client, defendant Frank Dinucci, Jr., who has been released pending sentencing pursuant to an appearance bond dated April 6, 2017. We submit this letter respectfully to request that Mr. Dinucci's travel restrictions be modified to permit him to travel to and within additional states listed below on the condition that, prior to any trip, he submits a travel itinerary to Pretrial Services setting forth his transportation and lodging information.

Mr. Dinucci's travel had initially been restricted to the Southern and Eastern Districts of New York, the District of Connecticut, the District of South Dakota, Districts within Ohio, and travel to allow him to reach those Districts. On May 25, 2017, the Court enlarged Mr. Dinucci's travel restrictions to include the District of New Jersey, the District of Nevada and Districts within the states of California and Florida, provided that Mr. Dinucci gives advance notice of his travel itineraries to Pretrial Services and obtains approval for his travel to those Districts from Pretrial Services. On August 14, 2017, the Court further enlarged Mr. Dinucci's travel restrictions to include Districts within the states of Michigan and Texas, provided that Mr. Dinucci gives advance notice of his travel itineraries to Pretrial Services and obtains approval for his travel to those Districts from Pretrial Services. On September 11, 2017, the Court further enlarged Mr. Dinucci's travel restrictions to include the Western District of Pennsylvania, provided that Mr. Dinucci gives advance notice of his travel itineraries to Pretrial Services and obtains approval for his travel to those Districts from Pretrial Services.

Mr. Dinucci now seeks to have his travel restrictions expanded to allow him to take trips to and within the following states, provided that he submits his travel itineraries to Pretrial Services in advance of any travel: Washington DC, Virginia, Colorado, Arizona, Louisiana, Minnesota, Massachusetts, South Carolina, Missouri, Missouri, Georgia and North Carolina.

Mr. Dinucci seeks this travel expansion because he has recently entered into an agreement, through his wholly owned limited liability company FD3, LLC, to serve as a consultant for Green Marbles -- an institutional integrator of "smart facility" hardware and

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security software. Mr. Dinucci's role will be to sell the firm's hardware and software to potential clients – primarily commercial real estate owners and universities. He anticipates frequent interstate travel involved in this role, and the potential for the scheduling of last minute trips as unexpected opportunities arise.

Pretrial Services Officer Kenneth Rowan and AUSA Joshua Naftalis both consent to this request.

Respectfully submitted,



Daniel C. Zinman

cc: AUSA Joshua A. Naftalis (via e-mail)
AUSA Andrea M. Griswold (via e-mail)
Officer Tiffany A. Francis, U.S. Pretrial Services (via email)
Officer Kenneth Rowan, U.S. Pretrial Services (via email)